



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John H. Hager, Treasurer
Republican Party of Virginia, Inc.
115 East Grace Street
Richmond, VA 22319

APR 2 1997

Identification Number: C00001305

Reference: 30 Day Post-General Report (10/17/96-11/30/96)

Dear Mr. Hager:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H3 of your report discloses a transfer(s)-in from a non-federal account(s) for administrative/voter drive which appears to exceed the permissible amount(s) indicated by your allocation ratio for administrative/voter drive. Please be advised that transfers for shared activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that

REPUBLICAN PARTY OF VIRGINIA, INC.
PAGE 2

the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Please clarify all expenditures made for radio ads & production on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

REPUBLICAN PARTY OF VIRGINIA, INC.
PAGE 3

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of \$32,071 in the federal share of shared federal/non-federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$29,662. Please amend your report to clarify the discrepancy.

-Line 21(a)(ii) of the Detailed Summary Page of your report discloses a total of \$42,513 in the non-federal share of shared federal/non-federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$39,319. Please amend your report to clarify the discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	1	1
FOR LINE NUMBER 11c		

Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Republican Party of Virginia

FEC ID No. C00001305

A12

A. Full Name, Mailing Address and ZIP Code Barry Campaign Fund PO Box 1146 Fairfax VA 22030 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer political committee Occupation n/a Aggregate \geq \$ 1000.00	Date (month, day, year) 10/25/96	Amount of Each Receipt This Period 1000.00
B. Full Name, Mailing Address and ZIP Code Central Fidelity Government Relations Fund PAC Richmond VA 23219 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer PAC Occupation Aggregate \geq \$ 250.00	Date (month, day, year) 10/31/96	Amount of Each Receipt This Period 250.00
C. Full Name, Mailing Address and ZIP Code McGuire Woods Battle & Booths PAC 901 E Cary St Richmond VA 23219 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer PAC Occupation Aggregate \geq \$ 5000.00	Date (month, day, year) 10/28/96	Amount of Each Receipt This Period 5000.00
D. Full Name, Mailing Address and ZIP Code Tennessee Employees Good Government Fund 701 Pennsylvania Ave NW Washington DC 20004 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer PAC Occupation Aggregate \geq \$ 5000.00	Date (month, day, year) 10/17/96	Amount of Each Receipt This Period 5000.00
E. Full Name, Mailing Address and ZIP Code Truck & Trunk Club 401 Atlantic Ave Apt 1002 Virginia Beach VA 23451 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer PAC Occupation Aggregate \geq \$ 2000.00	Date (month, day, year) 10/22/96 11/8/96	Amount of Each Receipt This Period 1000.00 1000.00
F. Full Name, Mailing Address and ZIP Code Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate \geq \$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate \geq \$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			13250.00
TOTAL This Period (last page this line number only)			13250.00

